

**PULLMAN & COMLEY, LLC**  
ATTORNEYS AT LAW

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**By U.S. Mail and Electronic Filing**

June 28, 2006

Patricia M. French, Senior Attorney  
NiSource Corporate Services  
Legal Department  
300 Friberg Parkway  
Westborough, MA 01581

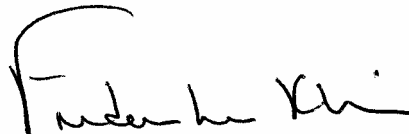
RE: Bay State Gas Company, D.T.E. 06-36

Dear Ms. French:

Enclosed please find the First Data Request of Hess Corporation for Bay State Gas Company, along with instructions for all discovery submitted by Hess to the Company.

Thank you for your Consideration. Please let me know if you have any questions.

Very truly yours,



Frederic Lee Klein  
Pullman & Comley  
90 Statehouse Sq.  
Hartford, CT 06103

cc: Mary L. Cottrell, Secretary - original and one copy  
Julie Westwater, Hearing Officer - one copy  
Electronic Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

\_\_\_\_\_)  
**Bay State Gas Company** )  
\_\_\_\_\_)

**D.T.E.06-36**

**HESS CORPORATION  
FIRST SET OF INFORMATION REQUESTS**

**I. Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by Hess Corporation to Bay State Gas Company (the “Company”) in this proceeding.

- 1) Please provide the response to each numbered request on a separate sheet of paper, or papers. Each sheet of paper should be three-hole punched.
- 2) For each response, please state (1) the name(s) and title(s) of the person(s) responsible for preparing the response, (2) the name(s) and title(s) of the person(s) who are competent to give testimony concerning the response and concerning all documents produced as part of the responses.
- 3) Where information requested is not available in the precise form described in the question, or is not available for all years indicated, please provide all information with respect to the subject matter of the question that can be identified in the Company’s workpapers or files, or that is otherwise available.
- 4) As used in this information request, and in these instructions, “available” means within the party’s knowledge, possession, or control, or within the party’s power, capacity or ability to retrieve or obtain from an affiliate, a contractor, or any other source.
- 5) Please send copies of the responses to these information requests to:

Frederic Lee Klein  
Pullman & Comley  
90 Statehouse Sq.  
Hartford, CT 06103

Fax: 860 424 4370  
E-mail: [fklein@pullcom.com](mailto:fklein@pullcom.com)

Rebecca S. Bachelder  
Blueflame Consulting  
80 Warwick Road  
Melrose, MA 02176

E-mail: [rbachelder@bflame.com](mailto:rbachelder@bflame.com)

- 6) If any of the requests are unclear, or if the Company has any objections to the requests, please contact Fred Klein or Rebecca Bachelder at 860-424-4354 and 781-662-8584 respectively to discuss the matter. Please communicate any objections within 7 days of receipt so that Hess can rephrase or redirect the particular information request(s).

## **II. DATA REQUESTS FOR BAY STATE GAS COMPANY BY HESS CORPORATION**

### **First Set**

- Hess 1-1. Please provide copies of the Company's responses to all discovery requests by DTE staff and all other participants to this proceeding.
- Hess 1-2. Please provide forecast design day sales separately for Bay State and Northern Utilities for 2006, 2007, 2008 and 2009 excluding the 30 percent reserve proposal.
- Hess 1-3. Please provide forecast design day capacity MDQs for Bay State and Northern for 2006, 2007, 2008 and 2009 excluding the 30 percent reserve proposal.
- Hess 1-4. In what year would Bay State need to acquire capacity for its growth needs absent the 30 percent proposal?
- Hess 1-5. In what year would Northern Utilities need to acquire capacity for its growth needs absent the 30 percent proposal?
- Hess 1-6. What type of resource (e.g., year round pipeline, winter supply, peaking, standby service, or some alternative) would Bay State attempt to acquire to meet its 30 percent reserve proposal?
- Hess 1-7. Please provide the following:
- a list of OFO days for the winters of 05/06, 04/05, 03/04, 02/03.
  - The amount of gas nominated for transportation customers for the above days, including intraday nomination adjustments.
  - The amount of gas used by transportation customers on the above days.
  - Aggregate imbalances by date for the above OFO days.
- Hess 1-8. Please define "overtake".
- Hess 1-9. Can overtakes be caused by customers other than grandfathered customers?
- Hess 1-10. For the non-daily metered program, please provide by month for 2003, 2004, 2005 and YTD 2006:
- the monthly usage,
  - the ATV adjusted for actual weather,
  - the difference between a. and b., and
  - the percent difference between a. and b.

- Hess 1-11. How many non-daily metered transportation customers have annual usage in excess of 250,000 therms per year?
- Hess 1-12. How many non-daily metered transportation customers have usage less than 250,000 therms per year?
- Hess 1-13. Please provide a timeline showing the nomination and confirmation activities and flow of metered usage information between marketers, Bay State and the pipelines for a typical gas day.
- Hess 1-14. What economic incentive(s) do marketers have to under-deliver on an OFO day?
- Hess 1-15. Are grandfathered customers in the non-daily metered program part of Bay State's 30 percent reserve proposal?
- Hess 1-16. Please indicate by rate class, the MDQ and number of customers for the following categories as of December 2005, or some other more recent date if available and please identify that date:
- Grandfathered customers in the daily metered program.
  - Grandfathered customers in the non-daily metered program.
  - Non-grandfathered customers in the daily metered program.
  - Non-grandfathered customers in the non-daily metered program.
- Hess 1-17. Please indicate by rate class, the MDQ and number of customers who have returned to sales service for 2002, 2003, 2004, 2005 and 2006:
- Grandfathered customers in the daily metered program.
  - Grandfathered customers in the non-daily metered program.
  - Non-grandfathered customers in the daily metered program.
  - Non-grandfathered customers in the non-daily metered program.
- Hess 1-18. Would Bay State use the reserve capacity procured for grandfathered customers for sales customers under any circumstance, i.e., force majeure or economic dispatch? If yes, please describe the situation(s). If no, please describe why not.
- Hess 1-19. Please identify the marketers on Bay State's system for each year since the Model Terms and Conditions were implemented.
- Hess 1-20. Can Bay State identify a specific customer who "overtakes" on any given day?
- Hess 1-21. Please describe the emergency plans in place for Bay State and for New England in the event of a force majeure event or another supply emergency?
- Hess 1-22. Does Bay State consider its proposal to be cost-based? If so, please explain.
- Hess 1-23. Describe Bay State's proposal for the disposition of revenues received from mitigation efforts for the 30 percent reserve capacity. How can Bay State

distinguish between mitigation efforts for the 30 percent reserve capacity and other capacity? Which capacity has priority for mitigation and why? How will Bay State determine which mitigation revenues relate to the 30 percent reserve and which relate to other capacity?

Hess 1-24. Please describe Bay State's response and timing of such response to the directives set forth by the Department in its June 6, 2005 Order in DTE 04-01 to "...improve performance or implement procedures...on the matters of...(2) access to and modification of consumption algorithms; and (3) monthly true-ups of differences between forecast usage and billed usage."